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A NATION IN NEED: THE AIR RESERVE COMPONENT AND WILDLAND
FIREFIGHTING

by

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Biography

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Abstract

Air Reserve Component (ARC) aircrews and modified C-130 Modular Airborne Fire Fighting System (MAFFS) aircraft provide Wildland Fire Fighting (WFF) for national fire emergencies. As of today, ARC assets execute this mission in multiple statuses to include a mix of Title 10 USC, which are federalized activated forces, and Title 32 USC, which is a status normally reserved for duty under a governor's authority. In recent years the Office of the Secretary of Defense (OSD) has sought to require all MAFFS missions operate exclusively under Title 10 authority, a position that ARC forces have adamantly resisted as unfeasible for an all-volunteer force. While multiple reasons are cited, OSD's insistence on Title 10 is primarily based on lines of authority. ARC concerns include the implications of federalization under Title 10 as well as the response delays resulting from Title 10 activation. Ultimately, this paper sought to answer the question: Is the DoD best served by mandating Title 10 operations for all MAFFS missions? Because of the broad and complicated nature of this discussion, this paper deliberately scoped the Title 10 discussion down to just the MAFFS mission, but parallels could be derived for all operations where the ARC and USNORTHCOM work in conjunction under Defense Support to Civil Authorities (DSCA). This paper ultimately argues that a better solution is to seek to resolve OSD's primary concerns about lines of authority while allowing continued Title 32 operations. This paper cannot propose to solve this issue, but offers prevailing themes found as a result of the research that, when implemented together, will help address the specific problems of lines of authority in MAFFS operations while allowing the ARC forces to continue to be effective and responsive under a mixed status to include Title 32.

Introduction

When called upon, Air Reserve Component (ARC) aircrews and modified C-130 Modular Airborne Fire Fighting System (MAFFS) aircraft provide Wildland Fire Fighting (WFF) for national fire emergencies. As of today, ARC assets execute this mission in multiple statuses, to include a mix of Title 10 USC, which are federalized activated forces, and Title 32 USC, which is a status normally reserved for duty under a governor's authority. In recent years the Office of the Secretary of Defense (OSD) has sought to require all MAFFS missions operate exclusively under Title 10 authority, a position that ARC forces have adamantly resisted as unfeasible for an all-volunteer force. While multiple reasons are cited, OSD's insistence on Title 10 is primarily based on lines of authority. ARC forces concerns include the implications of federalization under Title 10, as well as the response time implications resulting from Title 10 activation.

Thesis

While operating MAFFS under Title 10 may be optimum for improved lines of authority, it may not be in the best interest of the DoD or the ARC.

Background

The origins of the MAFFS firefighting capability extends back to 1970 when a series of fires were unable to be contained by commercial tankers and conventional methods, causing the destruction of over 500 California homes and buildings and three quarters of a million acres of wildlands. Following this, the Air Force, at the request of Congress, designed and developed the MAFFS system as a method to augment commercial aviation resources in the event they become overwhelmed. This augmentation, or surge force, became formalized by Congressional action in

1975, creating an official agreement of support between the DoD, and multiple other federal entities.¹

Today the federal response to the wildland firefighting effort is coordinated by the National Interagency Fire Center (NIFC). The NIFC's primary method for fighting fires is civilian land firefighting and contracted civilian airtankers. If and when this capability is no longer sufficient, the NIFC requests MAFFS augmentation. Upon official request by the NIFC, the Commander, US Northern Command (CDRUSNORTHCOM) is responsible for providing MAFFS resources as a surge capability to fight domestic fires.²

Today this MAFFS mission is conducted by eight specially equipped ARC C-130 aircraft. Two aircraft are in the Air Force Reserve Command (AFRC) and six are in the Air National Guard (ANG).³ The ARC assets execute this mission in multiple statuses to include a mix of Title 10 activated forces, and Title 32 forces. In the years following the creation of USNORTHCOM, OSD has increased their call for requiring all MAFFS support be conducted under Title 10. This paper argues that while operating MAFFS under Title 10 may be optimum for improved lines of authority, it is not in the best interest of the DoD or the ARC.

Methodology

Ultimately, this case study sought to answer the question: is the DoD best served by mandating Title 10 operations for all MAFFS missions? The intent of this paper is to follow a logical plan in finding an answer through exploring four subordinate questions. The first question asks what the supported entity's primary priorities are with regard to the MAFFS mission. Next, this paper inquires about the case for exclusive Title 10 operations, and why it is being proposed now. The next question examined is why the Guard prefers the option to serve in a Title 32

status. Finally, this paper asks what lessons history can provide, by conducting a brief review of the MAFFS safety record.

These questions were selected as a qualitative way to evaluate the problem with the hope of increasing the basic understanding of the issues through expanding the discussion beyond lines of authority, and examining all of the implications of a Title 10 mandate. Because of the broad and complicated nature of this topic, this paper deliberately scoped the Title 10 discussion down to just the MAFFS mission, but parallels could be derived for all operations where the ARC and USNORTHCOM work in conjunction under Defense Support to Civil Authorities (DSCA).

As the supported entities, what is USDA and USNORTHCOM's primary concerns with regard to the MAFFS mission?

As previously discussed, a fundamental aspect of the MAFFS mission is the surge capability that is called upon when other avenues of commercial airtanker support is insufficient. Perhaps because the very nature of the support is contingent on insufficiency of capacity, timeliness and responsiveness repeatedly rise as top concerns when reviewing documentation provided by supported elements of wildland firefighting.ⁱ This includes the standing OPORD for MAFFS, where Verbal Orders of the Commanding Officer (VOCO) is authorized in order to expedite an expected 48 hour response timeline.⁴ In reality, response times are often much faster, as the NIFC reported in 2012, when most requests were filled within 36 hours.⁵ Timely responsiveness

ⁱ In addition to the examples to follow in this article, USNORTHCOM Wildland Firefighting CONOPS 2010 states the purpose of wildland firefighting is to "Execute rapid and effective support to NIFC to lessen and mitigate the effects of wildland fires." Additionally, the new National Cohesive Wildland Fire Management Strategy, signed in April 2014, enforces a primary goal of the strategy being wildfire firefighting response.

is also emphasized by the USDA's 2012 *Large Airtanker Modernization Strategy* report, where aviation resource effectiveness is correlated with responsiveness.⁶ Not surprisingly, urgency is also the priority for the supported COCOM. 1AF (AFNORTH), in response to a 2014 Air Staff inquiry on this topic, responded that the priority pertaining to MAFFS was "capability delivered to NIFC in a timely manner."⁷

The question of timeliness and responsiveness is perhaps one of the most compelling counterpoints to mandated Title 10 operations. For states that own MAFFS assets, on occasion the governor, in coordination with the NIFC, may task the Guard to immediately provide wildland firefighting assistance under Title 32. The National Guard is the nation's only military force shared by the states and the federal government, and is tasked to be a ready and reliable force "accessible to the states for both state and combined state and federal purposes and to the federal government for federal purposes."⁸ A 2004 OMB report to Congress on MAFFS utilization validated the state use of MAFFS at the request of the Governor:

Consistent with DOD/JDOMS guidance, the MAFFS Operating Plan used by NICC states that the Governors of California, Wyoming and North Carolina may activate their in-state MAFFS resources for within-state utilization at any time by simply notifying NIFC prior to the activation. MAFFS are available to Colorado on the same basis as other States that do not have MAFFS assigned to Air National Guard units.⁹

If and when the Governor calls upon Guard forces to support operations within their state, they do so under the authority of Title 32. This means, among other things, that the authority and responsibility for those forces remain with the Governor.

In 2014, OSD sought to mandate all MAFFS operations be conducted exclusively under Title 10 operations.¹⁰ While it is unclear if the intent of this proposed policy was to prohibit governors the power to activate MAFFS aircraft within their state under their own authority, it certainly appears this would be the likely result of such a policy. Removing this capability could

significantly undermine the immediate availability of MAFFS capabilities to the Governors of California, Wyoming, and North Carolina, and could be inconsistent with the National Guard construct.

When considering how changes to responsiveness could be impacted under a mandated Title 10 policy, it is incomplete to look only at the impact to governors operating within a state, other force generation shortfalls must also be considered. A working group composed of broad DoD component representation was convened by OSD in 2013 specifically to study impediments to MAFFS Title 10 support. The group studied twenty different issues as possible impediments to Title 10 status. The group determined that: “Mandating Title 10 duty status may adversely impact the availability of Reserve Component volunteers [technicians] and in turn the ability of USTRANSCOM to meet the MAFFS requirement as directed by USNORTHCOM.”¹¹ Beyond force generation impediments driven by the reluctance of technicians to be activated, the group also expected that response times could also be delayed past the 48-72 hour window due to the “lengthier and more cumbersome” process of Title 10 orders generation.¹²

After reviewing the implications of Title 10, it is clear that such a requirement could jeopardize one of the most important aspects of wildland firefighting: timely response. A Title 10 mandate would also undermine a governor’s ability to immediately respond to fires within their own state. Perhaps more troubling, the cumbersome process of federalizing the firefighting force would create serious force generation issues for the ARC that could prevent it from even conducting the mission.

What is the case for Title 10 operations, and why is it being proposed now?

Since 2002, the responsibility for command and control of homeland defense, and coordination of defense support to civil authorities has fallen on USNORTHCOM.¹³ While the

issue of proper command authorities for MAFFS has been around well before 2002, it was the establishment of USNORTHCOM combined with the painful lessons learned from Hurricane Katrina that highlighted the importance of unity of command during domestic disasters.¹⁴

The course of action chosen by DoD to achieve improved unity of command was to seek federalization of all forces in support of domestic disasters. This was first attempted with the 2007 National Defense Authorization Act, that included draft wording to make federalization possible, but was later repealed after coordinated state governor intervention. Again in 2009 and 2010 the DoD pursued the request, prompting the House Armed Services Committee to demand the DoD: “engage with the community of governors to work out an understanding of unity of effort during domestic terrorist events and public emergencies.”¹⁵ Despite the resistance, some elements within OSD have continued to seek federalization of forces conducting domestic operations in lieu of improving unity of effort between the state and federal agencies. This fight has now extended to MAFFS operations.

The 2014 MAFFS Execution Order (EXORD) outlining support by USNORTHCOM for wildland firefighting required the formation of an Air Expeditionary Group (AEG) to support anticipated short-notice requests by the NIFC for wildland firefighting support. Paragraph 2.A designates CDRAFNORTH as the Joint Force Air Component Commander (JFACC) who will “provide operational control (OPCON) of Title 5, and Title 10, or exercise coordinating authority with Title 32 DoD aerial firefighting assets...”¹⁶ While there are other ancillary issues that will be discussed later in this paper, this dual arrangement between Title 10 and Title 32 is the primary concern when discussing MAFFS operations. In a 2014 OSD action memo submitted to the staff of the Secretary of the Air Force for coordination, the problem was stated as follows:

This action seeks to establish a clear line of command authority from the Secretary of Defense to a Supported Combatant Commander. In this mixed duty

status construct for DoD support of DOI and USDA, the Secretary of Defense and the Commander, U.S. Northern Command (CDR USNORTHCOM) do not have command authority over the personnel who comprise the majority of available forces¹⁷

The search for how to improve this command structure, however, predates USNORTHCOM. In the wake of a particularly destructive firefighting season in 2000, the CSAF tasked Active, Guard and Reserve forces to work with the Air Force Doctrine Center to review and improve the MAFFS command structure, culminating in a report on Wildland Firefighting in July 2001.¹⁸ In an effort to improve lines of authority, the aforementioned MAFFS AEG position was created as a result of this report with the hope it would provide a more efficient chain of command and better coordination of MAFFS assets serving under multiple statuses. Insightfully, it was further identified in the 2001 report that, even with an AEG, the current policy of Coordinating Authority between the AEG and Title 32 forces was insufficient.

So what is Coordinating Authority, and why was it found insufficient as a construct? Coordinating Authority is described in JP 1 as “the authority delegated to a commander or individual for coordinating specific functions and activities involving forces of two or more Military Departments...”¹⁹ Most parties in this discussion agree that Coordinating Authority (at least on its own) does not provide the necessary framework for an enforceable mechanism for command. In addition to the critique offered by the October 2000 report, AFNORTH/A5 has the position Coordinating Authority “is more applicable for planning than operations, and does not have the authority to resolve disputes.”²⁰ Additionally, Air Force Instruction 90-1001, *Responsibilities for Total Force Integration*, states: “Coordinating Authority should not be used when describing command arrangements for integration initiatives.”²¹ Finally, NGB/A5 acknowledges that the MAFFS Execution Order designating Coordinating Authority creates an

“implied handshake agreement” that needs clarification.²² So while parties are divided about the impact of a Title 10 mandate, all agree that the current construct of Coordinating Authority is unable to facilitate clear lines of authority on its own.

Why does the Guard prefer Title 32 status?

On the surface, requiring all MAFFS assets operate under Title 10 seems to make sense. All unity of command issues and Coordinating Authority shortfalls are resolved while following a model that represents how a COCOM is usually expected to command their forces. However, as with many Total Force concepts, the solution is not as clean as it appears. As already discussed, exercising a plenary government authority of Title 10 federalizes all aspects of wildland firefighting, thereby jeopardizing response times while marginalizing the governor authority.

But the Guard’s considerations extend beyond these issues and include multiple pay/benefits and volunteerism concerns. The MAFFS Duty Status Working Group held in June 2013 examined seven pay and benefits issues identified in a 2013 action memo to the Deputy Secretary in April 2013. These pay and benefit issues included pay delays, DEERS enrollment interruption, leave accrual, TSP eligibility and healthcare coverage and benefits. At the center of the issue is the turmoil caused to Guard Technicians who are activated to Title 10 status. Since Technicians form a substantial part of the MAFFS qualified force (39% of USAFR and 30% of ANG), these issues needed to be examined closely.

Pay and Benefits Table

Impact on Technicians when activated to Title 10 status²³

Military Pay Delay	When activated for periods <30 days, technicians performing MAFFS duty have a payment interruption/delay of 4-6 weeks
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DEERS Interruption	As a result of transitioning back and forth from full-time technician to active duty, DEERS can show members as ineligible for care due to active service within the post-deployment transition period.
Leave Accrual Interruption	Technicians who would otherwise be eligible, no longer earn annual and sick leave under activations when exercising Leave Without Pay (LWOP).
TSP Contribution	A technician in LWOP status may potentially lose both employee and matching TSP contributions. Under some circumstances technicians can buy-back TSP contributions under a cumbersome process that can take up to a year.
Healthcare Benefits	MAFFS missions average 8 days in duration, which is less than the 30 day active duty requirement to keep TRICARE coverage for their family members.

Since a full-time technician serving under a Title 32 status has none of the pay and benefits issues listed in the table above, Guard leadership has serious concerns about volunteerism under a system that does not require an involuntary mobilization. Because MAFFS activations are usually short, and with little advanced notice, involuntary mobilization is also not a likely option, due to in part to the lengthy process of involuntary mobilization and, more importantly, the fact that involuntary mobilization is usually reserved for cases of a national emergency.

Hardship caused by activation to Title 10 is not reserved to the technician force, however. Problems are only compounded when looking at MAFFS qualified Drill Status Guardsmen who are not technicians. Drill Status Guardsmen, regardless of status, face multiple hurdles when supporting MAFFS, since they must coordinate time away from their full-time civilian positions to support MAFFS call-ups, often only to face short notice cancellations. In 2012, the fire season

had 86 days of continuous employment where units were asked by the NIFC for four short notice requests for support. The average since 2006 has been 2.8 short notice requirements per year.²⁴ These taskings not only include short notice activation but also short notice de-activation. Since 2006, MAFFS has averaged 3.1 short notice cancellations to their missions per year. This instability and unpredictability of the taskings may help explain why the MAFFS mission so heavily relies on a more flexible Title 32 status and more accessible full-time technicians. Activating the Drill Status Guardsmen under Title 10 might only be effective if done for the entire firefighting season. This would be a prohibitively expensive option for the USFS who is responsible for reimbursing the DoD for operational expenses incurred while supporting wildland firefighting.

What insight does the history of the program provide?

Before turning to solutions, addressing the considerations of supporting MAFFS operations under a split status would be incomplete without also looking at the 40 year history of MAFFS support that has delivered over 9.7 million gallons of retardant. Every single one of these fires seasons has had crews serving in a mixed status to include Title 10 and Title 32, and every single season commanders have had to navigate the difficulties of unity of effort without unity of command.

Despite these challenges, it is difficult to argue, based on the history of the program, that this problem is directly correlated to an increased safety of flight issue. By its very nature, using aviation assets in wildland firefighting is hazardous. In the ten years spanning 2002 to 2012, the USFS reports 11 fatal accidents across a spectrum of different fixed wing and helicopter aircraft.²⁵ In contrast, reviewing MAFFS safety data since its creation in 1970 shows several close calls, but only one instance of a fatal accident, and the cause was not directly contributed to

unity of command. On July 1, 2012 a C-130 from the 145th Airlift Wing, North Carolina Air National Guard, had a fatal mishap while conducting wildland firefighting operations in South Dakota. Four Airmen died and two additional Airmen suffered serious injury. The accident investigation determined the crew inadequately assessed the operational conditions, resulting in flight into a microburst and impacting the ground.²⁶ While clearer lines of command may be beneficial to the traditional combatant commander construct of force employment, MAFFS 40 year history would argue that split-status crews do not appear to prevent safe conduct of the mission.

Recommendations

Examining the four subordinate questions in this paper highlights the difficulty of mandating Title 10 for all MAFFS operations. While the desire to unify lines of authority is understandable, it highlights a tension between active and ARC forces operating in many areas of DSCA. There are a host of thinkers today looking at unity of effort with regard to DSCA, a problem one author at the Strategic Studies Institute labeled a “complex challenge among the greatest in our age.”²⁷ So perhaps the culminating question is how can OSD’s primary concerns regarding MAFFS be addressed while allowing the Guard to operate under Title 32? This paper cannot propose to solve this issue, but can offer prevailing themes found as a result of the research that, when implemented together, will help address the specific concerns about the lack of clear lines of authority of MAFFS operations, while allowing the ARC forces to continue to be effective and responsive through a mixed status of Title 10 and Title 32.

First recommendation: Abandon mandated Title 10 operations. The impact on a governor’s ability to draw on their own state forces, the reduced responsiveness caused by activating ARC forces, the host of pay and benefits penalties to technicians, and the force generation dilemmas

caused by the limitations to volunteerism all compel this author to propose that mandated Title 10 operations for all MAFFS missions would be counterproductive. Instead the OSD should focus its efforts on alternative ways to improve unity of effort.

Second recommendation: Utilize dual status command for the MAFFS AEG commander. The challenge for the DoD all the way down to the MAFFS AEG commander is the ability to safely bring to bear the right capabilities at the right time and place. The focus then, needs to be on unity of effort, not unity of command. First and foremost in achieving this goal should be utilization of the dual status commander:

While state and federal military forces maintain separate and distinct chains of command, this Dual-Status Commander leads all military forces and directs their response efforts, achieving a level of unity of effort that was unachievable or difficult prior to implementation of this construct.

Gen. Charles H. Jacoby, Jr.(USNORTHCOM/CC), and Gen. Frank J. Grass (Chief NGB)²⁸

The dual-status commander is a relatively new and unutilized option at the disposal of the DoD for the MAFFS mission, that, when used, can address the tension between state and federal control during a natural disaster. It was this tension that led the nation's governors to collaborate with the DoD in raising the dual-status command concept into law with the 2012 National Defense Authorization Act.²⁹ In 2013 Gen. Charles H. Jacoby Jr., Commander USNORTHCOM, called the dual-status command concept one of the most important initiatives to improve defense support of civilian authorities in more than a decade.³⁰

This now formal designation was specifically created to address unity of command challenges like the ones currently cited by OSD in MAFFS operations. The status is already proving successful in planned exercises and a few large scale disasters, to include the Colorado flooding and Hurricane Sandy response, where, for the first time actual tactical control of

National Guard and DoD forces under a mix of Title 10 and 32 was given to dual-status commanders for a major, multi-state natural disaster.³¹ This concept has only been applied in MAFFS in a limited manner, and as of the 2014 wildland firefighting season, has not been formally delegated to the MAFFS AEG commander.

Third recommendation: Craft a clear and directive Interagency Agreement. The doctrinal premise of Coordinating Authority lacks rigor on its own and needs a robust interagency agreement to spell out the nature, extent and degree of control a dual-status commander would be given. According to current guidance, the MAFFS AEG commander “exercises command authority over all assigned military personnel in Title 10 and Title 5 status, and coordinating authority over all personnel participating in Title 32 and State Active Duty (SAD) status.”³²

While the command authority delegated by the JFACC is clear, as previously outlined in this paper, the Coordinating Authority for Title 32 forces would still exist, and thus, needs clarification. The NGB is currently exploring resolving this shortfall via a clearer and more directive interagency agreement. If successful, this agreement would specifically spell out the nature, extent and degree of control the CDRUSNORTHCOM and the dual-status MAFFS AEG commander could exercise over personnel serving in Title 32 status in support of wildland firefighting operations. The agreement, of course, would need consent of the governors and the DoD, but could go a long way in clarifying the shortfalls of coordinating authority without amputating the Title 32 option as currently proposed by OSD.

Conclusion

Ultimately, this paper sought to answer the question: Is the DoD best served by mandating Title 10 operations for all MAFFS missions? Because of the broad and complicated nature of this discussion, this paper deliberately scoped the Title 10 discussion down to just the

MAFFS mission, asking four subordinate questions in the hope of gaining a greater understanding of the implications of mandated Title 10 operations. This paper first explored the fundamental priority of responsiveness in wildland firefighting, and the implications to that tenant under mandated Title 10 operations. This paper highlights that removing a governor's scope and authority to fight his own fires could have serious implications on responsiveness. Additionally, exploring this subordinate question underscored the possibility that a mandate to activate ARC forces under Title 10 could jeopardize the Guard's ability to responsively generate forces. The next subordinate question sought to explore the often asked question on this topic, why now, what is broken? This portion of the paper drew on the creation of USNORTHCOM, followed by the Katrina disaster, as the impetus for a call for change. In exploring this call, the limits of Coordinating Authority are repeatedly highlighted, an authority that, on its own, is unable to build unity of command or even unity of effort. Next this paper asked the question, what are the Guard's concerns? As it turns out, these are quite significant, and range from the highly political concerns of governor's authority, to highly practical problems of pay, benefits, and volunteerism. Finally this paper further explored the why now question by asking, what insights does the history of the program provide? This last question appears to teach us that the MAFFS 40 year history has shown that despite concerns with lines of authority by the DoD, there is little evidence that operating in a split status of Title 32 and Title 10 creates, on its own, an unsafe condition.

Because of a host of issues addressed in this paper, this research ultimately argues that a better solution is to address and correct OSD's primary concerns about lines of authority while allowing continued Title 32 operations. This paper cannot propose to solve this issue, but offered three recommendations for CDRUSNORTHCOM and OSD consideration. The first

recommendation is to abandon the mandate of Title 10 MAFFS operations. The implications are too broad for this mission. The second recommendation is to utilize the dual-status commander for the 2015 wildland firefighting season. Discussing deficiencies in lines of authority in MAFFS operations prior to exercising this option is premature, and should be utilized as a first step in increasing unity of command. Finally, this paper recommends USNORTHCOM, in cooperation with the governors, the NGB, and the USFS, craft a clear and directive Interagency Agreement that more adequately addresses the limiting nature of Coordinating Authority. Specifically, this interagency agreement must spell out the nature, extent and degree of control the CDRUSNORTHCOM and the dual-status MAFFS AEG commander could exercise over personnel serving in Title 32 status. Through utilizing a dual-status commander that is empowered by a robust interagency agreement that properly addresses the shortfalls of coordinating authority, the MAFFS wildland firefighting mission could serve as a benchmark for multiagency operations achieving unity of effort in a multitude of DSCA operations.

Appendices

Other Considerations

Because of the complex nature of this discussion, there are multiple other factors that should be considered in the MAFFS discussion but were not explored for this paper. This includes:

An All Active Component MAFFS Mission

In response to force generation concerns there has been some consideration given to an all active component force for the MAFFS mission. Due to the extended specialized training required (5-7 years), when combined with the largely domestic mission, as of 2014 it was the opinion of the Directorate of Operations, Headquarters, United States Air Force that this mission is ideally suited for the ARC. More study may be needed.

The Current use of Technicians for the MAFFS Mission

MAFFS dependence on technicians to conduct operations may be a problem. The MAFFS Duty Status Working Group recommended the DoD General Counsel, OSD Comptroller and SAF/RE review the reimbursement rules for technicians providing MAFFS support for the NIFC to ensure the legality of the current system.³³

Increased USFS Funding for Contracts

Because of the high cost of utilizing DoD assets in firefighting, MAFFS is most economical when used as a surge capacity. Too much dependence on MAFFS is not cost effective and exacerbates problems outlined in this paper. According to the 2014 MAFFS AEG commander's after action report, too little dependence is also an issue: "With more civilian tankers, MAFFS aircrew experience required by AFI cannot sustain itself without enough use each year to gain experience to cover attrition."³⁴ The right balance is critical to MAFFS operational effectiveness and need to be studied.

Death Benefits

When not on activated Title 10 military orders, technicians do not receive several significant benefits that are available to Title 10 military service members, to include service member death gratuity, dependency and indemnity compensation, mortuary service death benefits, and the Survivor Benefit Plan. This argument is often made by OSD when advocating a Title 10 mandate. It is the opinion of this author that this is a gratuitous attempt to make unity of command an emotional issue. Guard members frequently perform hazardous duty under Title 32 status, and frequently this is done alongside activated members in Title 10 status. If the death benefit for Title 32 status is insufficient then it should be addressed instead of using it as leverage in a Title 10 mandate.

Notes

¹ Brig Gen John Iffland et al., *US Air Force Support to US Forest Service: Wildland Fires*, October 2000, 1-2.

² USNORTHCOM, *Wildland Firefighting (WFF) CONOPS*, May 2010, 1.

³ GS-13 Fillinger, *Bullet Background Paper on Command and Control (C2) and Impact of Duty Status Title-10 (T-10) Title-32 (T-32)/Title-5 (T-5) In Modular Airborne Firefighting Systems (MAFFS) Operations*, 1AF (AFNORTH)/A5X.

⁴ AFNORTH *Standing OPORD for Support to NIFC and WFF Operations*, 28 February 2014, para 3.F.

⁵ National Interagency Firefighting Center, *Modular Airborne Fire Fighting Systems FAQ and Fact Sheet*, <https://www.nifc.gov/maffs/MAFFS>, 6 March 2012.

⁶ USDA Forest Service, *Large Airtanker Modernization Strategy*, 17 January 2012, 4.

⁷ Dye, Col Craig E. Chief of Staff AFNORTH. To Headquarters USAF, A3O-AM. E-mail, 28 Jan 2014.

⁸ Maj Gen Timothy J. Lowenberg, *The Role of the National Guard in National Defense and Homeland Security*, National Guard Association of the United States, 1.

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